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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Numbering Resource Optimization) CC Docket No. 99-200
)
Petitions for Reconsideration)
And Clarification)

OPPOSITION OF WORLDCOM, INC.

WorldCom, Inc. ("WorldCom") supports many parties that recently sought reconsideration of the Commission's March 31, 2000 *Report and Order* on Numbering Resource Optimization ("*NRO Order*"). There is fairly widespread agreement among industry members regarding the aspects of the *NRO Order* that merit reconsideration. The industry largely supports the uniform implementation of sound numbering resource optimization measures. Such an implementation will promote more efficient use of numbering resources without sacrificing the benefits of national numbering administration. The Commission has previously recognized the benefits of national numbering administration over more fragmented administration.¹ The *NRO Order* explicitly acknowledged the importance of uniform standards for thousands-block

¹ See, *In the Matter of Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order on the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215 and 717, et al, Memorandum Opinion and Order and Order on Reconsideration*, NSD File No. L-97-42, CC Docket No. 96-98 (September 1998) (*Pennsylvania Order*)

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number pooling to minimize the confusion and additional expense related to compliance with inconsistent regulatory requirements.²

Yet a few state commissions have asked the Commission to reconsider its commitment to keep numbering administration as uniform as is feasible throughout the country. WorldCom urges the Commission to dismiss state commission demands for authority to establish fifty variations of numbering administration. The state commissions have not shown any benefit to such variation. But it would surely impose unnecessary costs on service providers that operate across many states. Those costs will inevitably be passed on to consumers. WorldCom also takes this opportunity to oppose a few aspects of petitions for reconsideration filed by other parties.

I. The Commission should dismiss petitions to reconsider its commitment to nationally uniform numbering administration.

A. There is no reason to defer the date by which state pooling trials must conform to the national pooling framework.

Both the California Public Utilities Commission (“CPUC”) and the Maine Public Utilities Commission (“MPUC”) have asked this Commission to reconsider its requirement that state pooling trials conform to the national pooling framework by September 1, 2000.³ The CPUC seeks this deferral not only for pooling trials that are already underway, but also for every pooling trial that it may initiate before the national pooling rollout reaches California. These state commissions have provided no evidence to show that conformity to the national rules will in any way limit the effectiveness of their pooling initiatives. Instead they have offered only unsupported assertions which

² ¶ 169.

provide no basis upon which to disturb the Commission's determination that state trials conform to the national framework by September 1, 2000.

According to the CPUC, the success of its number pooling efforts depend upon the application of a 75% utilization threshold to pooling carriers and the use of "imminent exhaust criteria."⁴ Since the national framework does not include either of these, California insists that the Commission should defer the date by which state pooling trials must conform to the national rules until the national rollout begins. However, the CPUC has failed to prove that conformity with the national rules would in any way compromise its pooling efforts.

The CPUC's entire argument is that the 75% utilization threshold and "imminent exhaust criteria" have suppressed needless block requests. The basis for this claim is a disparity between the forecasts submitted by service providers and the actual number of block applications that have been made. The CPUC notes that carriers forecasted the need for 424 blocks during the first two quarters of pooling in the 310 NPA, but have drawn only 102 blocks.⁵ The CPUC credits this difference to its utilization threshold and implies that without such a threshold service providers would undoubtedly have drawn many more blocks. This simplistic argument fails to consider the possibility that carriers still inexperienced in forecasting block demand may in fact overestimate their needs. If the CPUC were correct, one would expect that in states where pooling is implemented without a utilization threshold, forecasts and applications would match more closely than in California.

³ See, e.g., California Public Utilities Commission's *Petition for Waiver*, CC Docket No 99-200 (filed August 4, 2000.) (*CPUC Waiver Petition*)

⁴ CPUC Petition at 2-3.

⁵ *Id.* at 4.

The CPUC cannot make such a case because the facts do not support it. Indeed, in the 312 NPA in Illinois, a state which does not require pooling carriers to meet a utilization threshold, the forecasted block demand for the first two quarters of this year was 86 blocks. Only 28 blocks were actually assigned.⁶ It is clear that with pooling, forecasted block demand appears to exceed assignments regardless of whether a utilization threshold is required. This refutes the CPUC's argument that the disparity between forecasted demand and assignments is related to the utilization threshold.

According to the MPUC, the Commission should defer compliance with the national framework in order to have additional time to gather information and experience from state pooling efforts. The MPUC suggests that the Commission should not be concerned about a lack of uniformity since the states will coordinate their efforts through the National Association of Regulatory Utility Commissions ("NARUC"). In effect, the MPUC is suggesting that the Commission should vacate its national framework and delegate authority to establish such a framework to the state commissions working together under the auspices of NARUC. What the MPUC has not done is to show that the Commission's framework, which was adopted based on the record in this proceeding, is deficient or would in any way diminish the effectiveness of state pooling trials. Without such a showing, there is no basis upon which the Commission should reverse its decision to require conformity with the national framework.

The CPUC and the MPUC have failed utterly to demonstrate that state pooling efforts will be less successful when they conform to the national framework. There is no reason to defer the date by which the states must so conform. WorldCom urges the Commission to dismiss these requests.

⁶ This information was gathered from <http://www.numberpool.com>.

B. The Commission should not reconsider its decision to refrain from requiring pooling carriers to meet a utilization threshold before filing for growth resources.

In the *NRO Order* the Commission specifically exempted pooling carriers from complying with a utilization threshold.⁷ The Commission did so in recognition of the requirement that pooling carriers donate uncontaminated and lightly contaminated blocks, and stated that it would revisit this question only if application of the utilization threshold to pooling carriers would significantly increase numbering use efficiency.⁸ Despite the fact that there is no showing in the record that application of a utilization threshold to pooling carriers would improve efficiency, the CPUC and the MPUC both seek reconsideration of this issue.

Here, both the CPUC and the MPUC rely on the California experience described above to show that utilization thresholds are needed to suppress needless block requests. As shown above, this argument is without merit. There is no rational basis upon which to conclude that the CPUC's 75% threshold has had any impact on block requests. Yet use of such a threshold nationally would place a substantial burden on pooling carriers. Given the manner in which the utilization threshold is calculated, carriers would have to virtually exhaust their number inventory before they could apply for a growth block. This would place individual carriers at a significant competitive disadvantage when competing for customers that require a large volume of numbers.

The CPUC implies that because pooled blocks can be activated quickly, it does not matter that carriers are forced to all but exhaust their inventories. This is not correct. A carrier that does not have numbers in hand will always be at a competitive

⁷ ¶ 103.

⁸ *Id.*

disadvantage relative to a carrier that has numbers. The way to mitigate this problem, is to allow carriers to obtain additional resources when their inventory will exhaust within 6 months. For pooling carriers, it is quite likely that the use of a 75% threshold would bring them much closer to exhaust than 6 months.

The CPUC also suggests that the Commission's rules and the INC Pooling Guidelines are somehow deficient because they do not provide for ongoing block donations.⁹ The CPUC appears to completely misunderstand the way in which the block donation process and months-to-exhaust criteria work together. Once initial block donations are made, carriers may obtain growth blocks only upon a showing that current utilization and recent growth demonstrate a need for additional resources. There is no need for follow-up block donations, since additional resources will be allocated in blocks of one-thousand, not full NXX codes. After the initial donation, there is no reason to expect that carriers will make additional donations.

The MPUC alleges that a utilization threshold for pooling carriers is needed to mitigate the impact of unrealistic projections of carriers.¹⁰ This is incorrect. Since actual assignments tend to be significantly less than forecasted demand irrespective of the use of a utilization threshold, there is no need for such a threshold. This is not to say that carriers should not improve their forecasts. WorldCom expects that as carriers gain experience in forecasting block demand, their forecasts will improve. In any case, the application of a utilization threshold to pooling carriers will have no impact on actual block assignments. Its only impact will be to harm those carriers with the smallest inventories – competitive local exchange carriers (“CLECs”).

⁹ CPUC Petition at 6.

¹⁰ MPUC Petition at 4-5.

C. There is no need to clarify the transition from state to national pooling.

The CPUC alleges that the Commission's plan for the transition of state pooling trials to national pooling requires clarification. According to the CPUC, it is unclear whether or not that transition will begin during the nine months following selection of a national pooling administrator, or only subsequent to that nine-month period when the national pooling rollout commences.¹¹ The CPUC goes on to say that it is also unclear whether or not state commissions acting under delegated authority will be able to initiate new pooling trials even after that national pooling rollout begins: "California cannot imagine that the FCC anticipated that the states' efforts to implement pooling to the fullest extent possible before the national rollout begins would then grind to a halt for the first year or more of the rollout."¹² Of course, the Commission's plan is perfectly clear and requires no additional clarification. The CPUC is simply unsatisfied with that plan. Their request for clarification is really a request for reconsideration that the Commission should dismiss.

Under the *NRO Order*, states acting pursuant to delegated authority may initiate pooling trials that conform to the national framework and rules up until the point when the national pooling rollout commences. The Commission allowed this activity to continue in order to avoid a significant delay in pooling implementation. But once the national rollout begins, no new state trials may be initiated, and at that time the transition of state trials to national administration will begin. If states were allowed to move the target during this period it would delay the transition to individual state pooling to national pooling. Based on the record before it, the Commission concluded that the

¹¹ CPUC Petition at 17.

maximum pooling initiation activity should be no more than 3 NPAs per NPAC region per quarter. If the national rollout reaches this maximum, then it would be unreasonable to allow state pooling to exceed it. The Commission's delegation of pooling authority was clearly intended as an interim measure. Once national pooling begins, the states will have no authority to initiate additional trials.

The Commission's plan for national implementation also forecloses the request of the Florida Public Service Commission ("Florida") that the rate of national implementation be increased to 6 NPAs per quarter per NPAC region.¹³ According to Florida, Neustar has indicated that a faster rollout is feasible. However, the Commission has not yet selected a national pooling administrator. Moreover, Neustar is not the only entity affected by pooling implementation. The implementation schedule established in the *NRO Order* is based not only on Neustar's needs, but also on the ability of industry and the pooling administrator. The Commission should not at this time reconsider that schedule. Once the rollout begins, the Commission may discover that the number of NPAs per quarter can be increased. At that time the Commission may decide to adopt the schedule suggested by Florida.

D. The Commission should not expand the authority of states to engage in independent data collection.

While allowing state commissions to have access to data reported semi-annually to the NANPA, the *NRO Order* specifically prohibits states from imposing additional, regular reporting obligations.¹⁴ In so doing, the Commission clearly recognized the

¹² *Id.* at 18.

¹³ Florida Public Service Commission Petition at 5.

¹⁴ ¶¶ 75, 76.

substantial burden placed on industry members by duplicative reporting obligations. It is patently unreasonable to subject carriers to a multiplicity of reporting requirements. Yet the Public Utilities Commission of Ohio (“PUCO”) has asked the Commission to reconsider this element of the *NRO Order*.¹⁵ The Commission must dismiss this request.

According to the PUCO, independent data collection authority is critical to the exercise of other delegated authority. The Commission has already completely answered this argument by allowing state commissions access to the mandatory semi-annual reports. These data should provide state commissions with sufficient information to exercise whatever authority they possess. Moreover, the *NRO Order* permits state commissions to gather data for a specific purpose, so long as they do not impose a regular reporting obligation. No further authority is needed. The Commission must not open the door to 50 separate reporting regimes on top of the Commission’s own reporting obligation.

E. The Commission should not allow varying sequential assignment rules.

The PUCO also seeks reconsideration of the Commission’s sequential assignment rules. The PUCO asks that the Commission either adopt rules that the PUCO has established instead of the rules adopted in the *NRO Order*, or allow Ohio to maintain its current sequential assignment rules.¹⁶ The Commission should do neither.

The PUCO claims that its sequential number assignment rules are necessary to “lessen the potential for vanity number assignment or thousands block contamination.”¹⁷ Interestingly, the PUCO has nowhere defined what a “vanity number” might be. Nor has

¹⁵ PUCO Petition at 4.

¹⁶ *Id.* at 19.

the PUCO shown that its sequential assignment rules would deter block contamination in a competitively neutral manner.

Under the PUCO's rules, service providers are prohibited from assigning a number from any thousands block that is less than 10% contaminated, until at least 75% of all numbers in blocks that are more than 10% contaminated have been assigned. It is almost inevitable that this rule would create an incentive for a customer to "number shop" for a carrier that is able to provide numbers with the characteristics that the customer requires. The Commission should not replace its own sequential assignment rule with the PUCO's inflexible approach. A sequential assignment rule that gives one carrier a competitive advantage over another carrier when competing for a specific customer, based merely on the circumstances of its inventory, is inconsistent with the Telecommunications Act and the Commission's rules thereunder.¹⁸

In no circumstance should the Commission allow non-conforming state sequential assignment rules beyond January 1, 2000. It is unreasonable to expect a national service provider such as WorldCom to vary its assignment and inventory management policies on a state-by-state basis.

The CPUC also raises the issue of so-called "vanity numbers," and suggests that the Commission's sequential assignment rules must be clarified to prohibit non-sequential assignment of these suspect numbers.¹⁹ WorldCom suggests that there is no clear way to identify a "vanity number."²⁰ Customers benefit from having numbers that

¹⁷ *Id.* at 18.

¹⁸ 47 U.S.C. § 251(e)(1); 47 C.F.R. §§ 52.9(a) and (b).

¹⁹ CPUC Petition at 15.

²⁰ The Commission agrees that defining vanity numbers is "a daunting undertaking." Vanity numbers are not simply numbers that may spell out a particular word or phrase, but also may hold some other specific value to the customer, such as a digit pattern. As the Commission correctly recognized in its previous Toll Free decisions, vanity numbers are numbers that customers have a particular interest, be it economic,

they chose and find helpful to remember whether it be for the home or business.²¹ Unless the Commission allows carriers to assign out of sequence to meet all genuine customer requests, it will create an incentive for customers to “number shop” when seeking a service provider. Such an incentive is inconsistent with the Act and the Commission’s rules. The Commission must allow out of sequence assignments to meet any genuine customer request.

F. There is no need for a joint federal-state committee to review changes to the INC Guidelines.

The MPUC argues that the Commission should establish a joint federal state committee to review and approve all changes to the INC Guidelines.²² The CPUC also complains about the ability of industry to alter those guidelines.²³ The Commission should not establish this additional layer of bureaucracy on top of numbering administration. The Commission created the industry forum process to avoid unnecessary regulations and government oversight. The existing INC process is an open forum that allows participation by all parties, including state commissions. More importantly, NARUC and the state commissions are represented on the NANC, which exercises broad oversight over the INC process. If any proposed changes to the INC Guidelines would not serve the public interest, the states and all parties can use the NANC to address the problem.

II. The Commission should not reconsider its decision to require state cost recovery for costs related to state pooling trials.

commercial or otherwise. See, *In the Matter of Toll Free Service Access Codes*, Report and Order, CC Docket No. 95-155, DA 96-69 (January 1996) paras. 6-14.

²¹ For example, parents may wish to get a telephone number that spells the family’s last name or contains a home address for easy recall for their small children.

²² MPUC Petition at 7.

²³ CPUC Petition at 13.

In the *NRO Order*, the Commission correctly concluded that federal pooling cost recovery should provide recovery only for costs that would not have been incurred but for national pooling.²⁴ The Commission has further required all states conducting pooling trials to address cost recovery for those trials.²⁵ SBC now asks the Commission to clarify that any unrecovered costs resulting from state pooling, as well as costs related to implementation of EDR capability, should be included under the federal cost recovery mechanism. This request for “clarification” is a request for reconsideration in disguise, which the Commission should summarily dismiss.

There is no obligation on state commissions to undertake pooling. The Commission has made clear that it is the responsibility of those state commissions that do exercise pooling authority to provide for cost recovery. SBC now suggests, in effect, that the state commissions should receive a free pass on pooling cost recovery. This would be a most unwise policy that would perversely encourage state commissions to initiate pooling trials without regard to their cost. WorldCom urges the Commission to decline SBC’s invitation to regulatory irresponsibility and instead to make clear that state commissions and only state commissions can provide recovery for all costs, including EDR, related to state pooling activity.

III. Other Issues

A group consisting of rural telephone companies filed a joint petition asking the Commission exempt rural telephone companies from all reporting and record-keeping

²⁴ ¶¶ 218-219.

²⁵ ¶ 171.

requirements.²⁶ These companies suggest that because they are small and their demand for numbering resources is minimal, it is unnecessary for them to report data to the NANPA. This is not true. In order to have a complete picture of the use of an NPA and the NANP, all users must report. However, the burden on these companies will be significantly less than the burden on carriers with greater demand for numbering resources. Their utilization and forecasts will change little from one reporting period to the next. Thus, the Commission need not be concerned that the burden on these carriers is disproportionate to their use of NANP resources.

ACUTA recommends that the Commission establish an additional category of numbers – assigned but inactive.²⁷ This category would account for numbers that have been assigned to a particular end user, but are subject to periods of inactivity. WorldCom suggests that such an additional category would be unnecessary if the Commission would change its rules on reserved numbers, as carriers almost unanimously recommended, to allow reservation periods longer than 45 days. There is no record evidence to suggest that allowing reservations longer than 45 contributes to NPA or NANP exhaust. If the Commission reconsiders its reserved number rule, ACUTA's petition will be moot.

²⁶ Joint Petition for Reconsideration at 1.

²⁷ ACUTA Petition at 3.

PCIA argues that the FCC should amend its sequential numbering rules to match more closely the rules for reviewing applications for additional numbering resources, that would include states affirming or overturning NANPA decisions to withhold resources.²⁸ PCIA asserts that the sequential rules should be expanded to delegate authority to the NANPA to require carriers to demonstrate compliance with the sequential numbering rules, plus the additional oversight delegation to the states.

PCIA's proposal should not be adopted. WCOM agrees with PCIA that state enforcement would lead to a hodgepodge of sequential state-specific practices. However, placing subjective authority in the hands of the NANPA is no better a solution. The suggestion of PCIA implies a burdensome requirement for day-to-day snapshots of number inventories in order to provide any semblance of objectivity for the NANPA to assess whether the carrier had met its sequential numbering responsibility. Such a proposal is unworkable and cost prohibitive and should not be considered. Audits are the only reasonable means to determine if carriers are meeting their obligations for sequential numbering practices.

Finally, the Commission should dismiss Telcordia's request that the Commission reconsider its decision to make the initial pooling administrator term coterminous with the current NANPA term.²⁹ If the Commission granted Telcordia's request it could foreclose the realization of potential synergies between NANP administration and pooling administration. This would deny the industry and the public potential cost savings. The Commission's original decision was sound and should not be disturbed.

²⁸ PCIA Petition at 16.

²⁹ Telcordia Petition at 1.

IV. Conclusion

The Commission should deny the various petitions for reconsideration and clarification addressed in detail above. In particular, the Commission must make clear that it remains dedicated to maintaining a single, uniform system of numbering administration, by denying state petitions for authority to establish state-specific numbering rules.

Respectfully submitted,

WorldCom, Inc.

A handwritten signature in black ink, appearing to read 'Henry G. Mulquist', written over a horizontal line.

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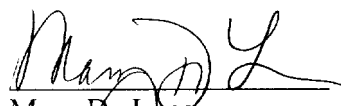
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August 15, 2000

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, the information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on August 15, 2000.

A handwritten signature in black ink, appearing to read "Mary De Luca", written over a horizontal line.

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CERTIFICATE OF SERVICE

I, Vivian Lee, do hereby certify that copies of the foregoing In the Matter of Numbering Resource Optimization, Petitions for Reconsideration and Clarification, Opposition of WorldCom, Inc. were sent via first class mail, postage paid, to the following on the 15th day of August 2000.

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